

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

LUIS A. ACEVEDO GARCIA, ET ALS. *

Plaintiffs *

vs. *

HON. ROBERTO VERA-MONROIG, *

ET ALS. *

Defendants *

Civil No.: 97-2639(JP)

MOTION

TO THE HONORABLE COURT:

COMES NOW plaintiffs, through the undersigned attorney, who very respectfully states and prays as follows:

Defendants Municipality of Adjuntas filed a Motion dated June 8th, 2005 in which it states in averment 8 as follows:

“We go further, I recently was advised that our client did not know the plaintiffs and that none was or had been an employee of the Municipality of Adjuntas.”

As we explained brother counsel Harry Segarra, in this particular case, Plaintiffs were not employees of the Municipality of Adjuntas but of the North Central Consortium, of which the Municipality of Adjuntas, specifically the Mayor, is a member of the Board of Directors and the city of Adjuntas is an integral part of the Consortium. We also informed brother counsel Harry Segarra that there is no way the Municipality of Adjuntas can state for the record that they do not know Plaintiff Claribel Pagán who was appointed in January by the Mayor of Adjuntas as Director of Human Resources of the Municipality of Adjuntas, reason

for which we strongly believe that Mayor Barlucea knows the person he appointed to one of the most important positions of his Cabinet.

WHEREFORE, It is respectfully requested that this Honorable Court takes notice of what it is above stated.

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Attorneys; Luis V. Villares Sarmiento, Esq., Sanchez Betances & Sifre, P.O. Box 195055, San Juan, Puerto Rico 00919-5055, lvillares@sbslaw.com, and Harry R. Segarra, Esq., Santa Maria Mall, 471 Ferrocarril Ave.-Suite207, Ponce, PR 00731, eqclaw@centennialpr.net.

RESPECTFULLY SUBMITTED.

In Aguadilla, Puerto Rico, this 28th day of June, 2005.

s/ Israel Roldán González
ISRAEL ROLDAN GONZALEZ
USDC-P.R. 115602
Attorney for Plaintiff
44 Progreso Street
Aguadilla, Puerto Rico 00603
Tel. (787) 891-1359
Fax. (787) 891-5000
roldanlaw@coqui.net